

SB-1450-C

1 Eisenberg Gold & Agrawal, P.C.
2 1040 Kings Hwy N #200
3 Cherry Hill, NJ 08034
4 (856) 330-6200
5 Attorney for: Santander Consumer USA Inc.
6 dba Chrysler Capital

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

7 In re:) Case No. 24-10069 (JNP)
8 JOHN J. ZAPPILE, JR.) Chapter 13
9)
10)
11) **OBJECTION TO CONFIRMATION**

12 Santander Consumer USA Inc. dba Chrysler Capital (“Chrysler Capital”), a secured
13 creditor of the Debtor, objects to the Debtor’s plan for the following reasons:

14 a. The plan does not deal with/does not mention Chrysler Capital in regards to Chrysler
15 Capital’s claim for the **2020 Jeep Wrangler**. Chrysler Capital objects, on the basis that
16 if the plan were to complete early, and completes before the loan maturity date of the
17 Debtor’s secured loan with Chrysler Capital, there is a risk that the Debtor will take the
18 position that the loan with Chrysler Capital has been discharged under §1325. To resolve
19 this issue, part 4(f) of the plan should be revised to state that the claim of Chrysler
20 Capital is unaffected by the plan and will not be discharged upon completion of the plan.
21
22

23 /s/ William E. Craig
24

25 _____
26 William E. Craig, attorney for
27 Santander Consumer USA Inc.
28 dba Chrysler Capital

29 Date: 3-18-24